

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

NELSON WILLIS,

Plaintiff,

vs.

ADAM M. ARON,

Defendant.

Case No.: 4:23-CV-732-ALM-KPJ

**DEFENDANT ADAM M. ARON’S RESPONSE TO
PLAINTIFF’S MOTION ALLEGING FRAUDULENT CONVEYANCE AND
DEMAND FOR IMMEDIATE ACTION**

Defendant Adam M. Aron (“Aron”) requests that the Court exercise its sound discretion and deny Plaintiff’s Motion Alleging Fraudulent Conveyance and Demand for Immediate Action (the “Motion”), filed on July 23, 2024 [Dkt. 78]. Plaintiff’s Motion clearly lacks merit and should be denied. Indeed, the Motion is so utterly frivolous that no substantive response from Aron should be necessary. However, if the Court desires a substantive response from Aron, Aron is happy to comply with an Order directing same.

Respectfully submitted,

By: /s/ Richard A. Illmer

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CERTIFICATE OF SERVICE

The undersigned certifies that on August 6, 2024, a true and correct copy of the foregoing document will be electronically mailed to the parties that are registered or otherwise entitled to receive electronic notices in this case pursuant to the Electronic Filing Procedures in this District.

/s/ Richard A. Illmer

Richard A. Illmer